REMARKS

A total of 23 claims remain in the present application. The foregoing amendments are presented in response to the Advisory Action mailed August 13, 2007. More particularly, claims 6 and 15 have been amended in order to place the claims into better condition for appeal. Support for the amendments in claims 6 and 15 is found throughout the original text and claims of the present application. As such, it is believed that entry of the amended claims is proper, and such action is courteously requested.

Referring now to the text of the Final Office Action:

- claims 2-22 and 24-25 stand rejected under 35 U.S.C. § 112 as failing to comply with the written description requirement; and

- claims 2-22 and 24-25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the teaching of United States Patent No. 6,968,209 (Ahlgren et al.) in view of United States Patent No. 6,879,989 (Dietrich et al..).

On page 3 of the Advisory Action, the Examiner argues that:

"...that arguments (response 7/30/07, page 3) presented by applicant were covered in the final office action, applicant does not raise any new arguments that would require a specific response.

For purpose of accuracy of the record, examiner points out that col.5, line 33 of the Ahlgren reference discloses "2 bytes/record" and not "2 bytes/phonebook" as asserted by applicant.

In response to applicant's arguments regarding the claimed "preparing an SMS in the electronic token" against the references individually, one cannot show nonobviousness by attacking references individually where the rejections are based on combinations of references. See In re Keller, 642 F.2d 413, 208 USPQ 871 (CCPA 1981); In re Merck & Co., 800 F.2d 1091, 231 USPQ 375 (Fed. Cir. 1986)."

With respect to the first of these issues, Applicant maintains that the claim rejections under 35 U.S.C. § 103(a) presented in the final office action (May 30, 2007) do not appear to refer to the wording of the claims as amended in Applicant's response dated April 18, 2007. Furthermore, at least some of the issues raised in the final office action (May 30, 2007) appear to be moot in view of the claim amendments submitted in Applicant's response dated April 18, 2007.

With reference to the last of these issues, Applicant acknowledges that "one cannot show nonobviousness by attacking references individually where the rejections are based on combinations of references" However, if none of the references (taken individually) teach or fairly suggest a claimed feature, then it is axiomatic that the combination of those references cannot possibly teach or suggest the claimed feature.

Claim rejections under 35 U.S.C. § 103(a)

At paragraph 2 of the Detailed Action, the Examiner argues that "the claim (claim 6) fails to specify 'multiple checksums' calculation's task" With respect, the Examiner's argument is not understood. In particular, claim 6 defines a step of:

"for each one of the plurality of records:

calculating in the electronic token a respective change detection code (CDC) associated with the record;"

It is difficult to imagine how this claimed operation might be accomplished without calculating multiple CDCs (checksums). Applicant is of the view that the above-noted limitation in claim 6 explicitly defines the calculation of multiple checksums, and more particularly defines that a respective checksum is calculated for each record of the database.

A similar difficulty arises with respect to the Examiner's claims rejections under 35 U.S.C. § 103 (a) starting at paragraph 4 of the detailed action, in that each of these rejections appear to relate specifically to the previous wording of the claims; and fails to take into account the amendments made in Applicant's response filed April 18, 2007.

In addition, it will be noted that claim 6 defines "A method applied by an electronic token... ". The person of ordinary skill in the art will immediately, and without difficulty understand that "a method applied by an electronic token" naturally implies that that the electronic token itself performs the steps recited in the claim. This fact is further reinforced by the language of each of the claim limitations; thus: "calculating in the electronic token ..."; "comparing in the electronic token..."; and "preparing a Short Message Service (SMS) message in the electronic token...". Thus it will be perfectly clear to the skilled artisan that the different steps of the claimed method are performed by the electronic token itself, i.e. inside the electronic token.

In direct contrast, Ahlgren provides no indication of the location where the processing of the single CDC is to be done. Without such an indication of the location where the processing would be done, the skilled person will properly revert to conventional techniques. As is well known in the art, electronic tokens such as smart cards are well known (and commonly referred to) as "resource-constrained" devices, because of their extremely low processing ability. As a result, if any functionality requires a specific calculation to be performed, such calculations are normally executed by the handset hosting the electronic token. This is typically the case, even when the software for controlling the calculation is stored on the token. Accordingly, in the absence of a specific teaching of where the calculation is to be performed, the person of ordinary skill will naturally deduce that such calculation should be performed by the handset hosting the electronic token, and not by the electronic token itself as required by the present claims.

Examiner has admitted that Ahlgren fails to teach the step of preparing an SMS in the electronic token and sending the SMS from the electronic token to the registering element.. The examiner relies on a Dietrich as allegedly providing the missing teaching. However, Dietrich fails to teach or fairly suggest anything equivalent to the claimed function of preparing an SMS message in the electronic token and sending same to a registering element. Indeed Dietrich only expresses the general principle of SMS messages, that is: some SMSs being displayed on the screen of the receiving handset (normal SMSs), and some SMSs being used

directly by the receiving SIM for updating some data stored in the SIM (updating SMSs). In both of these cases, the SMSs are <u>received by</u> the electronic token, which is the exact opposite (and clearly in no way suggestive) of the claimed function of "<u>preparing</u> a Short message Service (SMS) message in the electronic token <u>and sending</u> the SMS message <u>from the electronic token to a registering element</u>," as required by the claims.

Finally, the person of ordinary skill in the art will recognise that Ahlgren teaches methods in which a change detection code stored in the SIM card is compared with a change detection code stored in a remote server, in order to determine whether the database on the SIM card needs to be synchronized with the remote server. In direct contrast, the present invention compares a CDC stored inside the electronic token with a "new" CDC, which is calculated inside the electronic token, and so determines whether the respective record (also stored on electronic token) has changed since the CDC was last calculated. As such, the present invention permits the synchronization process to be initiated independently by the electronic token, based on its own (entirely internal) comparison of old and new CDCs. The person of ordinary skill in the art will recognise that none of the cited references teach or fairly suggest this functionality. Rather, all of the known references require comparison with a CDC (or other data) stored on a remote server in order to determine whether synchronization is needed.

In view of the foregoing, it is believed that the presently claimed invention is clearly distinguishable over the teaching of Ahlgren et al. None of the known prior art provides the missing teaching. In particular, none of the know prior art references teach or fairly suggest the calculation of a respective CDC for each record, and the use of that respective CDC to send information of changes to a registering element via SMS messaging. Nor to any of the cited reference teach or fairly suggest the advantages obtained thereby.

Accordingly, it is believed that the present invention is in condition for allowance, and early action in that respect is courteously solicited.

Respectfully submitted,

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